

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**FRANK LIU,**

Plaintiff,

v.

**THE NIELSEN COMPANY (US) ET AL.,**

Defendants.

Case No. 1:22-cv-09084-JHR-OTW

Judge Jennifer H. Rearden

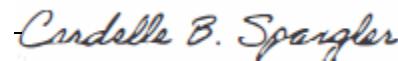
**DEFENDANTS THE NIELSEN  
COMPANY US LLC AND TNC US  
HOLDINGS' NOTICE OF MOTION  
TO DISMISS AMENDED  
COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of its Motion to Dismiss and the Declaration of Caitlin W. Tran and exhibits thereto, Defendants The Nielsen Company US LLC and TNC US Holdings (“Defendants”), by and through their undersigned attorneys, hereby move this Court for (i) an Order granting Defendants’ Motion to Dismiss Amended Complaint, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and (ii) such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the briefing schedule set by the Court during the conference on December 20, 2023, Plaintiff Frank Liu’s opposition is to be served by February 23, 2024. Defendants’ reply is to be served by March 8, 2024.

Dated: Chicago, Illinois  
January 26, 2024

Respectfully submitted,



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